

2 April 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

Structural Composites, Inc. is a Florida based research and development company focused on engineering and development of composites for marine, military, and other commercial applications. Structural Composites holds a controlling interest in Compsys, Inc., the manufacturer of preform composites under the brand name Prisma. Prisma Preforms are widely deployed across the Composites industry with the marine industry and segments of the transportation having a dependence on the product for lightweight durable constructions. Prisma Preforms feature Polyurethane foam which has HFC-134a as the blowing agent.

Rigid polyurethane creates a strong durable lightweight product that is used for structural recreational boat components such as stringers, bulkheads, hull and deck stiffeners, beams, fuel tank supports, structural members, long-span stiffeners, corner stiffeners, hull side-to-bottom strengthening. With boats, this material replaces products that were historically made from wood. In addition to the benefits to the recreational boating industry, the Department of Defense and the United States Navy also apply this technology to military applications under Phase I, II and III SBIR programs. This technology also has recently been adopted for on highway transportation applications. A major U.S. trucking company, Wabash National Corporation has is using Composite Structural Preforms to build next generation refrigerated semi-trailers and truck body's that are lighter and more thermally efficient than those built with conventional materials. The benefits of using lightweight structural materials include increased fuel efficiency, performance, and in many cases an increased payload with the added benefits of an extended life cycle.

Research is ongoing to investigate whether alternatives to HFC-134a can be used in this process **but at this time no alternative exists.**

The overall environmental benefits greatly outweigh the small amount of GHG required to manufacture these products. The improved fuel efficiency directly relates to a long-term significant reduction in downstream GHG emissions. The one-time non-recurring GHG generation is quickly offset as fuel generates about 28 pounds of GHG per gallon.

CARB has recognized the life cycle GHG savings and has provided us an exemption for Structural Composite Preforms. Now we are seeing numerous individual state actions each trying to regulate 134a. While we are trying to address known state actions, it is very difficult for a small business to keep up with all the state actions no less provide education and lobbying to each. This addresses the need for Preemption. Chairman Barrasso addressed the impact on interstate commerce, the example was equipment. Please consider our critical national network of semi-trailers is it really feasible to have a 134a semi-trailer to have to stop at state lines and unload to a HFC free trailer? Individual state regulation is untenable and this bill really needs to include Preemption.

The name of the bill implies promotion of technology and innovation. I want to state how regulation used as a blunt instrument can kill American innovation. Our technology was derived from a Navy Small Business Innovative Research Program. We were charged with improving performance and cost for the Navy. The program highly encourages commercialization, we took the technology to the Transportation market, deploying semi-trailers and truck bodies that are lighter, more energy efficient, more durable and more load capable. All directives from the Department of Energy. The technology has been globally recognized including winning the 2018 the Defense Innovation Award. The Navy made a public release success story [https://www.navysbir.com/success/Structural\\_Composites-1.pdf](https://www.navysbir.com/success/Structural_Composites-1.pdf)

Factoring in life cycle GHG savings it is clear that the small non-recurring use of 134a in our applications more than offsets the recurring GHG, not to mention the operational cost saving, reduce road loads and extended product life cycle.

This leads to concerns about companies using patented technology and unfairly leveraging the technology using government regulation under the guise of American innovation. Our technology is patented, however we are competing in the marketplace bringing value, if we cannot bring value we will not successfully deploy. As the Chairman points out the 134a replacement is 10 times more expensive than 134a. Forcing deployment of patented technology using government regulation perverts the competitive landscape to the disadvantage of the consumer. Rather than force all these costs on the entire public I would rather see the government provide the patentholder technology funding so they can become competitive and supply products the consumers want to purchase. Think LED lightbulbs for example, huge negative non-recurring environmental impact, huge recurring GHG and energy savings benefit and priced so the consumer converts.

Since there are such significant benefits in GHG reduction from the use of lighter weight materials for transportation and infrastructure applications, the HFC bill needs to exempt Composite Structural Preforms and allow continued use of HFC134a for this process until such time as a suitable alternative is available. Compsys urges congress to create a category in the rule identifying this process as “Structural Composite Preforming” and exempt this process until at least January 2024. We request the bill have preemption so as not to interfere with interstate commerce.

Thank you for the opportunity to provide comments regarding this important issue. If you have any questions or comments or require further information, please do not hesitate to contact me at 321-795-6123, [slewit@aol.com](mailto:slewit@aol.com)

Sincerely,

Scott Lewit  
President  
Structural Composites, Inc.  
Compsys, Inc.

Codrington E. Barzey, Jr.  
7863 Loren Cove Dr.  
Melbourne, FL 32940  
Email: [cbarzey@structuralcomposites.com](mailto:cbarzey@structuralcomposites.com)  
Phone: 617-291-7542

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Structural Composites, Inc. for 4 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

PRISMA Preforms represent the commercialization of technology developed by Structural Composites. PRISMA has been and continues to be a very important part of our research and development efforts. PRISMA technology has been key on Navy work we have done to help make our warfighters have more capable and affordable platforms.

I have read Structural Composites/ Compsys, Inc.'s comments on pending regulation of 134a. I agree with the comments and urge Congress to provide an exemption for Structural Composite Preforming as requested.

Thank you.

Codrington E. Barzey, Jr.

*Codrington E. Barzey*

DORKA TRINIDAD  
106 SAN FILIPPO DR.  
PALMBAY, FL 32909  
321) 727-2329

04/06/2020

DORKA TRINIDAD COND@GMAIL.COM

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for 14 Years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

I have read Structural Composites/ Compsys, Inc's comments on pending regulation of 134a. We agree with the comments and urge Congress to provide an exemption for Structural Composite Preforming as requested.

Thank you

A handwritten signature in cursive script that reads "Dorka Trinidad". The signature is written in dark ink and is positioned below the typed name "Dorka Trinidad".

Shaun Walker  
3121 Cheryl Ct  
Melbourne, FL 32935  
321-684-0976, swalker@priforms.com

4/6/2020

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Thank you



Timothy Taylor  
288 Hinchman St.  
Palm Bay, FL 32909  
(321) 581-7519

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Thank you

Kandace Potts

1214 Port Malabar Blvd NE

Palm Bay, FL 32905

443-875-3913

petsitter 14 @ outlook.com

Anthony Rhinehardt

163 Monaco Rd

West Melbourne FL 32904

Rhinehardt21@yahoo.com

4/6/2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for 15 Years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

I have read Structural Composites/ Compsys, Inc's comments on pending regulation of 134a. We agree with the comments and urge Congress to provide an exemption for Structural Composite Preforming as requested.

Thank you



Gilberto Collazo  
154 Pleasant Grove Way  
Port St Lucie FL 34986  
321-557-4997 2190160231@gmail.com

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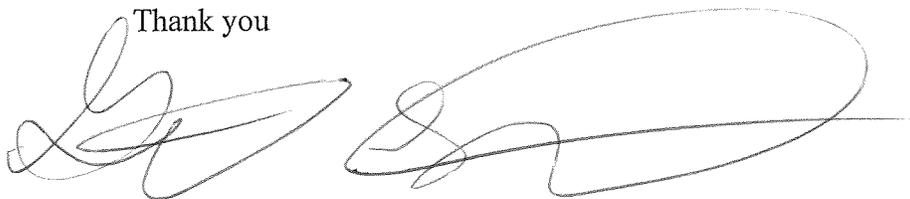
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Thank you



Jason Swager

Swaggs780@gmail.com

104 Prestige Dr.

Royal Palm Beach FL 33411

561-313-8225

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for 3 Years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

I have read Structural Composites/ Compsys, Inc's comments on pending regulation of 134a. We agree with the comments and urge Congress to provide an exemption for Structural Composite Preforming as requested.

Thank you

Jason Swager

A large, stylized handwritten signature in black ink, appearing to be the name 'Jason Swager' written in a cursive, flowing script.

Thomas Patton  
918 Brocksmith St SE  
Palm Bay, FL 32909  
321 205 7339 tom-patton@hotmail.com

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for 5 Years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

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Thank you

Thomas Patton



4/10/2020  
Crystal Jacoby  
600 Emerald Ct.  
Sahlik Beach, FL 32937  
321-412-1013; cjacoby@preforms.com

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for ~~20~~ years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

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Thank you

A handwritten signature in cursive script, appearing to read "Crystal Jacoby".

JUAN L. FIOLE, JR.  
2861 LOCKGLEY RD.  
MELBOURNE, FL 32935  
(321) 501-5744; jlfiole@preforms.com

RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for **23** Years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

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Thank you



04/06/2020

Ortiz Jorge L.  
~~329~~ 2925 KEMBLEWICK DR  
MELBOURNE, FL 32935  
321-339-6906

JO1552003@GMAIL.COM

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Thank you

Jorge A. Ortiz

Tralaine Hamilton  
556 Audubon Ave  
Palm Bay FL 32907

4/6/2020

7274845620 THamilton@preforms.com

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Thank you



Holly Hodge  
114 San Juan Cir  
Melb. Fl. 32935  
321-258-1702

4/06/2020

Hodge Holly@yahoo.com

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Thank you

Holly Hodge

4/06/20

Jarvis Dixon  
2935 Kemplewick Dr  
Melbourne, FL 32938  
321-350-7576

J.Dixon.Dixon92@gmail.com

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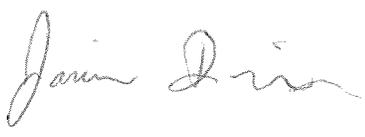
Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for Years. *2 months*

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Thank you



ALETHEA GOODPASTURE  
157 MAIN ST.  
SEBASTIAN FL 32958  
(321)831-0777 ALETHEAANGELL@GMAIL.COM

04/06/2020

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Thank you

*Alethea Goodpasture*

Barbara Owens  
911 Camphor Way  
Melbourne FL 32901  
0731-307-1302

04-06-2020

b Owens 3948@gmail.com

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Thank you

*Barbara Owens*

Jeremy Petrie  
309 Cactus St. SE  
Palm Bay FL 32909

4.6.2020

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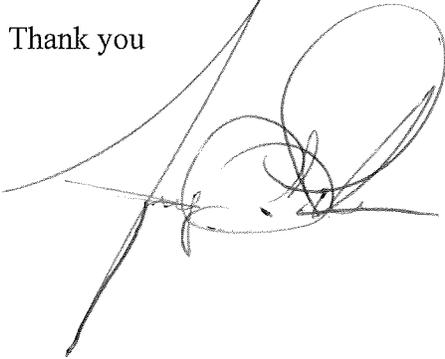
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Thank you

A handwritten signature in black ink, appearing to be 'Jeremy Petrie', written over a large, light-colored scribble or mark.

April 6, 2020

Robyn McDaniel / 1414 Musgrass Circle, W.Melbourne, FL 32904 / (321)698-0917 /  
ramcdaniel19@gmail.com

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and  
Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for .5 years.

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Thank you

Robyn McDaniel

4/6/2020

Melissa Covington

823 New Zealand Ave NW

321-423-3892

[Mcovington@preforms.com](mailto:Mcovington@preforms.com)

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Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for 7 months.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

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Thank you

Melissa Covington

Caryl Presnell 2700 Woodlake Dr #202 Palm Bay, FL 32905 321-223-1365

[cpresnell@gmail.com](mailto:cpresnell@gmail.com) 4-6-2020

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Caryl Presnell

1696 Silverado dr. Rockledge, FL  
(321) 652-1815

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Nate Randolph

April 6, 2020

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Dear Sir / Madam:

I am an employee of Compsys, Inc Producer of Prisma Preforms. I live in Brevard County Florida and have worked for Compsys for many years.

I produce Composite Preforms to make boats, semi-trailers, and truck bodies lighter and more fuel efficient and reduce their environmental impacts. I depend on Prisma preforms for my livelihood. If HFC 134a is banned for this process, I will no longer have a job.

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Nate Randolph

221 Avenida Del Mar  
Ft. Lauderdale, FL 33303  
nrandolph@preforms.com

William L. Johnson III  
998 Douglas ST SE  
Palm Bay FL, 32909  
Ph 321-372-6193

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Thank you

A handwritten signature in cursive script that reads "William L. Johnson III". The signature is written in dark ink and is positioned below the "Thank you" text.

Joshua Hagan  
1010 S Miramar N  
Indialantic, FL 32903  
Email: [jhagan@structuralcomposites.com](mailto:jhagan@structuralcomposites.com)  
Phone: 317-796-5885

April 7, 2020

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Thank you.



Josh Hagan

Crystal Newberry  
1781 Anchorage St NW  
Palm Bay, FL 32907  
Email: newberry0551@hotmail.com  
Phone: 321-506-0713

April 7, 2020

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Dear Sir / Madam:

I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Compsys, Inc. and Structural Composites, Inc. for 16 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

PRISMA Preforms represent the commercialization of technology developed by Structural Composites. PRISMA has been and continues to be a very important part of our research and development efforts. PRISMA technology has been key on Navy work we have done to help make our warfighters have more capable and affordable platforms.

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Crystal Newberry

Christopher Fagan  
200 E. University Blvd.  
Melbourne, FL 32901  
Email: [cfagan91@outlook.com](mailto:cfagan91@outlook.com)  
Phone: 630-636-1035

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Structural Composites, Inc. for 2 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

PRISMA Preforms represent the commercialization of technology developed by Structural Composites. PRISMA has been and continues to be a very important part of our research and development efforts. PRISMA technology has been key on Navy work we have done to help make our warfighters have more capable and affordable platforms.

I have read Structural Composites/ Compsys, Inc.'s comments on pending regulation of 134a. I agree with the comments and urge Congress to provide an exemption for Structural Composite Preforming as requested.

Thank you.

Christopher Fagan

A handwritten signature in black ink, appearing to read 'C. Fagan', written in a cursive style.

Lawrence Hays  
4610 Cinema St  
Cocoa, FL 32927  
Email: ldlphn1@aol.com  
Phone: 321-543-3481

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

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Thank you.

Larry Hays

A handwritten signature in cursive script that reads "Larry Hays". The signature is written in black ink and is positioned below the typed name.

Raymond Oliva  
2042 Nottingham Rd  
Melbourne, FL 32935  
Email: [rjr2261@yahoo.com](mailto:rjr2261@yahoo.com)  
Phone: 321-298-9816

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

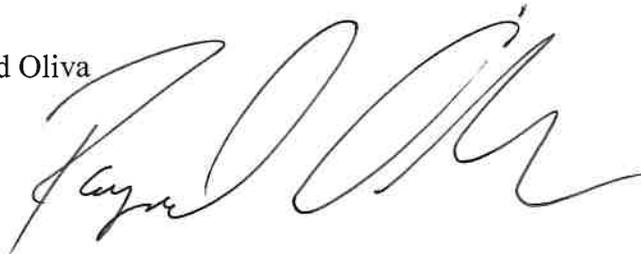
I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Structural Composites, Inc. for 2 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

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Thank you.

Raymond Oliva

A handwritten signature in black ink, appearing to read 'Raymond Oliva', written in a cursive style.

Pedro Ortiz-Guzman  
1082 Sand Creek Drive  
Melbourne, FL 32934  
Email: onedayatime72@yahoo.com  
Phone: 321-369-8423

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

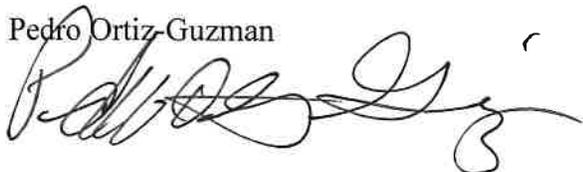
I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Structural Composites, Inc. for 3.5 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

PRISMA Preforms represent the commercialization of technology developed by Structural Composites. PRISMA has been and continues to be a very important part of our research and development efforts. PRISMA technology has been key on Navy work we have done to help make our warfighters have more capable and affordable platforms.

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Thank you.

Pedro Ortiz-Guzman

A handwritten signature in black ink, appearing to read 'Pedro Ortiz-Guzman', written over the printed name.

Patricia Baker  
9025 York Ln Apt F  
W Melbourne, FL 32904  
Email: [pacor1@aol.com](mailto:pacor1@aol.com)  
Phone: 321-917-8627

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Structural Composites, Inc. for 33 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

PRISMA Preforms represent the commercialization of technology developed by Structural Composites. PRISMA has been and continues to be a very important part of our research and development efforts. PRISMA technology has been key on Navy work we have done to help make our warfighters have more capable and affordable platforms.

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Thank you.



Patricia Baker

Michael J. Smith  
536 Golden Dove Ave NE  
Palm Bay, FL 32907  
Email: smith517s@yahoo.com  
Phone: 321-863-9747

April 7, 2020

**RE: Pending Federal Regulation of HFC: S. 2754, American Innovation and Manufacturing Act of 2019: Written Testimony and Questions for the Record.**

Dear Sir / Madam:

I am an employee of Structural Composites, Inc. I live in Brevard County, Florida and have worked for Structural Composites, Inc. for 13 years. Our sister company, Compsys, Inc., produces PRISMA Preforms.

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Thank you.

Michael J. Smith

